

## **EXHIBIT A**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

MATSUKAWA CO., LLC (n/k/a  
MATSUKAWA CO., LTD), individually and  
on behalf of all others similarly situated,  
Plaintiffs,

v.

BRASKEM S.A., ROBERTO LOPES  
PONTES SIMÕES, FERNANDO MUSA,  
and PEDRO VAN LANGENDONCK  
TEIXEIRA DE FREITAS,  
Defendants.

Case No. 2:20-cv-11366-CCC-ESK

Hon. Edward S. Kiel, U.S.M.J.

**SUPPLEMENTAL DECLARATION OF JOSEPHINE BRAVATA CONCERNING:  
(A) MAILING OF THE POSTCARD NOTICE; AND (B) REPORT ON REQUESTS FOR  
EXCLUSION AND OBJECTIONS RECEIVED**

I, Josephine Bravata, declare as follows:

1. I am the Quality Assurance Manager of Strategic Claims Services (“SCS”), a nationally recognized class action administration firm. I have over twenty years of experience specializing in the administration of class action cases. SCS was established in April 1999 and has administered over five hundred and twenty-five (525) class action cases since its inception. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein, and if called on to testify I could and would do so to the best of my ability.

**UPDATE ON MAILING OF THE POSTCARD NOTICE**

2. Pursuant to the Court’s Order Preliminarily Approving the Settlement, Certifying Settlement Class, Approving Notice to the Class and Scheduling Final Approval Hearing dated January 18, 2023 (Dkt. No. 63, the “Preliminary Approval Order”), SCS was approved as Claims Administrator to supervise and administer the notice procedure, as well as the processing of claims,

in connection with the Settlement in the above-captioned Action<sup>1</sup>. This supplemental declaration is to provide updated information regarding the notification process.

3. As noted in the Declaration of Josephine Bravata Concerning: (A) Mailing of the Postcard Notice; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion and Objections, dated April 4, 2023 (the “Initial Mailing Declaration”), 5,043 Postcard Notices were mailed to potential Class Members or nominees. Since the Initial Mailing Declaration was filed, SCS has mailed an additional 451 Postcard Notices. To date, a total of 5,494 Postcard Notices have been requested by, and mailed to, potential Class Members or nominees.

4. Additionally, as noted in the Initial Mailing Declaration, SCS was notified by one nominee that it emailed 3,453 of their clients to notify them of this settlement and provided a direct link to the Notice and Claim Form on the settlement webpage. SCS has not been notified that any further such emails have been sent since the Initial Mailing Declaration was filed.

5. Since the Initial Mailing Declaration was filed, an additional 13 Postcard Notices were returned as undeliverable. These 13 Postcard Notices returned as undeliverable were “skip-traced” to obtain updated addresses; 2 updated addresses were located, and Postcard Notices were re-mailed to the updated addresses.

#### **UPDATE ON TOLL-FREE PHONE LINE**

6. The Initial Mailing Declaration noted that SCS maintains a toll-free telephone number (1-866-274-4004) for Settlement Class Members to call and obtain information about the Settlement and/or request a Notice and Claim Form. SCS continues to promptly respond to each telephone inquiry and address Settlement Class Members’ inquiries.

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<sup>1</sup> All capitalized terms not otherwise defined herein have the meanings set forth in the Stipulation and Agreement of Settlement dated as of December 15, 2022 (Dkt. No. 59-2, the “Stipulation”).

### **UPDATE ON SETTLEMENT WEBPAGE**

7. The Initial Mailing Declaration also noted that on January 30, 2023, SCS established a page on its website at [www.strategicclaims.net/Braskem](http://www.strategicclaims.net/Braskem). The webpage is accessible 24 hours a day, 7 days a week. The webpage contains the current status; the case deadlines; the online claim filing link; and important documents. To date, the webpage has received 3,132 pageviews from 946 unique users.

### **UPDATE ON REPORT ON EXCLUSIONS AND OBJECTIONS**

8. The Notice, Summary Notice, Postcard Notice, and the webpage informed potential Settlement Class Members that written requests for exclusion were to be mailed to SCS such that they would be received no later than April 3, 2023. SCS has been monitoring all mail delivered for this case. To date, SCS has not received any requests for exclusion.

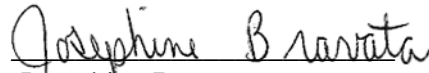
9. According to the Notice, Summary Notice, Postcard Notice, and webpage, Settlement Class Members seeking to object to the Settlement, the proposed Plan of Allocation of the Net Settlement Fund, the Judgment contemplated by the Stipulation, and/or the application for attorneys' fees and reimbursement of expenses were required to submit their objection in writing such that the request was received by Co-Lead Counsel and Defendants' Counsel, as well as filed with the Clerk of the Court, no later than April 19, 2023. As of the date of this declaration, SCS has neither received any objections nor been notified that an objection has been filed.

### **CLAIM FORM FILING STATUS**

10. To date, SCS has received 4,894 claims. The Notice, the Postcard Notice, Summary Notice, and the webpage informed potential Settlement Class Members that the claims filing deadline was postmarked or submitted by April 19, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 25<sup>th</sup> day of April 2023, in Media, Pennsylvania.

  
Josephine Bravata